

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
 )  
 )  
 )  
v ) No. 08 CR 122-7  
 ) Hon. Judge Amy J. St. Eve  
 )  
TERRY PETEN )

**MOTION TO MODIFY CONDITIONS OF RELEASE**

NOW COMES the defendant, Terry Peten, by and through his attorney, Ross M. Eagle and respectfully requests this Honorable Court modify the conditions of release to remove the condition of electronic monitoring. In support, Mr. Peten states as follows:

1. Mr. Peten was detained following his initial appearance on February 12, 2008.
2. On April 22, 2008, the Government and Mr. Peten agreed to certain conditions of release and Mr. Peten was released after posting property as collateral. Home detention was ordered as a condition of release.
3. On May 28, 2008, the Government agreed to Mr. Peten's oral motion to modify the conditions of release to impose a 7:00 a.m. to 7:00 p.m. curfew.
4. Mr. Peten has fully complied with all the conditions of his bond since his release from custody on April 22, 2008. There have been no violation reports filed.
5. Counsel has spoken to Mr. Peten's Pretrial Services Officer, Anthony Raya, who confirmed that Mr. Peten has been fully compliant with his bond. Mr.

Raya stated he has no objection to removing the condition of electronic monitoring from Mr. Peten's conditions of bond

6. Mr. Peten has been actively looking for a job, but often finds that the prospective jobs require work outside the hours of curfew.

WHEREFORE, Defendant Terry Peten respectfully requests that this Honorable Court modify the condition of his bond to remove the condition of electronic monitoring.

Respectfully submitted,

s/ Ross M. Eagle

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Ross M. Eagle, Attorney for  
Defendant Terry Peten

JESTER, KENWORTHY & EAGLE LLC  
Attorneys at Law  
53 West Jackson Boulevard  
Suite 1324  
Chicago, Illinois 60604

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## **NOTICE OF FILING AND PROOF OF SERVICE**

To: Terra Brown  
Assistant United States Attorney  
219 South Dearborn Street – 5th Floor  
Chicago, Illinois 60604

Anthony Raya  
Pretrial Services Officer  
219 S. Dearborn, Suite 15100  
Chicago, Illinois 60604

Please be advised that on July 15, 2008, I caused to be filed with the Clerk of the United States District Court for the Northern District of Illinois, Defendant Terry Peter's Motion to Modify Conditions of Release, a copy of which is attached and hereby served upon you.

s/ Ross M. Eagle

Ross M. Eagle, Attorney for  
Defendant Terry Peten

JESTER, KENWORTHY & EAGLE LLC  
Attorneys at Law  
53 West Jackson Boulevard  
Suite 1324  
Chicago, Illinois 60604

## CERTIFICATE OF SERVICE

I, Ross M. Eagle, an attorney, certify that I served a copy of the above notice, together with copies of all Motions listed upon the parties named above via electronic delivery pursuant to court rules on electronic filing on July 15, 2008.

/s/ Ross M. Eagle

Ross M. Eagle